

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:	:	Chapter 7
	:	
GABRIELE SANTE MARINO,	:	
	:	
	:	
Debtor.	:	Bankruptcy No. 24-10369-amc

**MOTION, STIPULATION AND CONSENT ORDER**

The undersigned parties hereby jointly move the court to extend the deadlines so that the First Meeting of Creditors under §341(a) may be continued and, in support of the motion, stipulate and agree as follows:

1. The Debtor filed a voluntary petition under Chapter 7 of the Bankruptcy Code on February 5, 2024.
2. On February 5, 2024, Gary F. Seitz was appointed interim trustee.
3. The First Creditors' Meeting under Section 341 of the Bankruptcy Code was scheduled by the Clerk of the Bankruptcy Court for March 14, 2024.
4. Debtor is unable to attend the First Creditor's Meeting until May 16, 2024 due to the time needed to acquire documentation.
5. Under §341(a) of the Bankruptcy Code the debtor is required to attend and participate in a creditor's meeting.
6. The deadline to file a complaint challenging the debtor's discharge is May 13, 2024. The time fixed under Federal Rule of Bankruptcy Procedure Rule 4004 to object to discharge, Rule 4007 to determine dischargeability of a debt, and the time period under Bankruptcy Rule 1017 to move for dismissal (or conversion) will expire before the Trustee,

United States Trustee or any Creditor will have had a full and complete opportunity to examine the debtor concerning possible grounds for objection to discharge, dischargeability or dismissal.

7. In order to allow the Trustee, United States Trustee or any Creditor ample opportunity to exercise their rights after the creditors' meeting has been completed, the debtor consents to extend the deadline for a period of 60 days after the completion of the creditors' meeting.

8. Debtor is available to attend a creditor's meeting on May 16, 2024.

9. Debtor has agreed to attend the meeting of creditors on May 16, 2024 and further agrees to extend the deadline for all parties to object to discharge or to seek dismissal.

WHEREFORE, pursuant to Federal Rules of Bankruptcy Procedure, Rules 4004(b)(1), 4007(c) and 1017(e), the parties request that the proposed form of order extending the deadlines be entered by the court.

/s/ Michael I. Assad  
Michael I. Assad  
Attorney for Debtor

/s/ Gary Francis Seitz  
Gary Francis Seitz  
Chapter 7 Trustee

Dated: April 23, 2024